

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HUGHES RIVER FM, LLC,
a Delaware limited liability company,

Plaintiff,

v.

XIMALAYA, INC.,
a Cayman Islands corporation,
YU JIANJUN, an individual,
SEAMAN YU, an individual,
XIAOYU CHEN, an individual,
LI HAIBO, an individual,
and TENCENT MUSIC ENTERTAINMENT
GROUP, INC., a Cayman Islands
corporation,

Defendants.

Civil Case No. 1:25-cv-06217

Hon. Edmond E. Chang

**UNOPPOSED MOTION TO EXTEND DATE TO RESPOND TO
AMENDED COMPLAINT**

Defendants Ximalaya, Inc., Yu Jianjun, Seaman Yu (duplicate of Yu Jianjun), Xiaoyu [*sic*] Chen, and Li Haibo (“**Defendants**”) move to extend the deadline for all Defendants¹ to move against, answer, or otherwise respond to Plaintiff Hughes River FM, LLC’s (“**Plaintiff**”) Amended Complaint once it is filed on the Docket. In support of their motion, Defendants state:

¹ Defendants move with consent from Defendant Tencent Music Entertainment Group, Inc.

1. Defendants request an extension to properly respond to Plaintiff's Amended Complaint once it is filed on the Docket.
2. Plaintiff filed its Complaint on June 4, 2025, and has represented that it served Defendants on June 10, 2025. *See* Dkt. 27-32. The Defendants' response to the Complaint currently on file is due July 25, 2025. (Dkt. 22).
3. On July 23, 2025, Plaintiff filed a Motion for Leave to File an Amended Complaint *Instantly* ("Motion," Dkt. 36), requesting leave to file a proposed Amended Complaint attached to the same Motion. The Motion is currently pending on the Docket.
4. Defendants do not oppose the Motion.
5. Defendants have good cause for this extension. It would waste party and judicial resources for the Defendants to respond to the current Complaint when the Plaintiff seeks leave to amend.
6. A proper defense against the amended pleading requires additional time. This is Defendants' first request for an extension to respond to the Amended Complaint and the additional time Defendants seek is not intended to unreasonably delay the matter or harass Plaintiff, nor will any party be prejudiced by the delay.
7. Counsel for all Defendants and Plaintiff have conferred regarding this extension and agreed to the following proposed briefing schedule to the extent that a motion to dismiss the Amended Complaint is filed. Defendants shall have thirty (30) days from the filing of the Amended Complaint to move

against, answer, or otherwise respond to it. *See* Fed. R. Civ. P. 15(a)(3).

Plaintiff shall file any opposition within thirty (30) days from the filing of Defendants' motions to dismiss the Amended Complaint. Defendants shall file any reply within twenty-one (21) days from the filing of Plaintiff's opposition papers.

8. Defendants submit this briefing schedule without waiver of any jurisdictional defense, including but not limited to lack of personal jurisdiction and insufficient service of process. The parties accordingly respectfully request that the Court enter an order to provide for the above schedule.

Dated: July 25, 2025

Respectfully submitted,

By: /s/Kenneth J. Vanko
Kenneth J. Vanko (ARDC 6244048)
Clingen Callow & McLean, LLC
2300 Cabot Drive, Suite 500
Lisle, Illinois 60532
(630) 871-2609
vanko@ccmlawyer.com

Vincent Filardo, Jr. (*pro hac vice*)
Andrew Sklar (*pro hac vice*)
Yi He (*pro hac vice*)
King & Wood Mallesons LLP
500 Fifth Avenue, 50th Floor
New York, NY 10110
(212) 319-4755
vincent.filardo@us.kwm.com
andrew.sklar@us.kwm.com
yi.he@us.kwm.com

Counsel for Defendants Ximalaya, Inc., Yu Jianjun, Seaman Yu (duplicate of Yu Jianjun), Xiaoyu [sic] Chen, and Li Haibo